

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD OF PUERTO RICO,

PROMESA  
Title III

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,<sup>1</sup>

No. 17 BK 3283-LTS  
(Jointly Administered)

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Debtors.

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**INFORMATIVE MOTION OF THE QTCB NOTEHOLDER GROUP  
REGARDING APRIL 22-23, 2020 OMNIBUS HEARING**

The QTCB Noteholder Group<sup>2</sup> hereby submits this informative motion pursuant to the Court's *Order Regarding Procedures for April 22, 2020, Omnibus Hearing* (Case No. 17-BK-3283, Dkt. No. 12721), and respectfully states as follows:

1. Sabin Willett of Morgan Lewis & Bockius LLP will appear telephonically on behalf of the QTCB Noteholder Group at the April 22-23, 2020, omnibus hearings to address, as necessary, the following matters:

- a. *Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The QTCB Noteholder Group has the same meaning as set forth in *Notice of Appearance and Request for Notice* (Dkt. No. 134, Case No. 17-3283 LTS) and *Fifth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* (Dkt. No. 11293, Case No. 17-3283).

*Class 39A and Class 41 Claims under Oversight Board's Plan of Adjustment Dated February 28, 2020 (the "Rule 3013 Motion," Dkt. No. 11989);*

- b. *Objection of the QTCB Noteholder Group to the Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying Class 39A and Class 41 Claims under Oversight Board's Plan of Adjustment Dated February 28, 2020 (the "QTCB Objection," Dkt. No. 12723);*
- c. *Partial Joinder and Statement in Support of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Invesco Funds with Respect to Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying Class 39A and Class 41 Claims under Oversight Board's Plan of Adjustment Dated February 28, 2020 (the "Assured Joinder," Dkt. No. 12687);*
- d. *Partial Joinder of Ambac Assurance Corporation to Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying Class 39A and Class 41 Claims under Oversight Board's Plan of Adjustment Dated February 28, 2020 (the "Ambac Joinder," Dkt. No. 12691, collectively with Assured Joinder, the "Joinders"); and*
- e. Any objections, responses, statements, joinders, or replies to the Rule 3013 Motion, the QTCB Objection, and the Joinders.

2. Counsel reserves the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases, and/or any adversary proceeding pending in the Title III cases.

**WHEREFORE**, the QTCB Noteholder Group respectfully requests that the Court take notice of the foregoing.

*[Remainder of page intentionally left blank]*

**RESPECTFULLY SUBMITTED,**

Dated: April 19, 2020  
San Juan, Puerto Rico

**Morgan, Lewis & Bockius LLP**

/s/ Kurt A. Mayr

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*Co-Counsel for the QTCB Noteholder Group*

**I HEREBY CERTIFY** that on April 19, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notifications of such filing to all attorneys of record.

**CORREA ACEVEDO & ABESADA  
LAW OFFICES, P.S.C.**

/s/ Sergio Criado

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